

1 ZARINAH J. MUHAMMAD, ESQ.
2 NEVADA BAR# 12830
3 JUSTICE FORCE LAW GROUP
4 6278 RUBY KINGLET
5 LAS VEGAS, NV, 89148
6 PHONE: 702-203-3530
FAX: 702-251-3769
ZARINAHATTORNEYATLAW@GMAIL.COM
ATTORNEY FOR PLAINTIFFS

7 **UNITED STATES DISTRICT COURT**
8 **FOR THE DISTRICT OF NEVADA**

10 A.M., a minor by and through her natural
parent and guardian, ZARINAH
11 MUHAMMAD; ZARINAH MUHAMMAD

12 Plaintiffs,

13 v.

14 CLARK COUNTY SCHOOL DISTRICT;
15 JESUS JARA; A.J. ADAMS; FELICIA
16 GONZALES; DIANE LEWIS;
17 CHRISTOPHER SPARROW; JOHN DOE
18 DEFENDANTS I THROUGH X; and, ROE
ENTITIES I THROUGH X

19 Defendants.

Case No.: 2:19-cv-00687-RFB-0VCF

13 **STIPULATION AND PROPOSED ORDER
TO EXTEND DEADLINES UNDER ECF NO.**

(FIRST REQUEST)

21 Plaintiffs A.M., a minor by and through her natural parent and guardian, ZARINAH
22 MUHAMMAD and ZARINAH MUHAMMAD (“Plaintiffs”) and Defendants CLARK
23 COUNTYSCHOOL DISTRICT; JESUS JARA; A.J. ADAMS; FELICIA GONZALES; DIANE
24 LEWIS; and CHRISTOPHER SPARROW (“Defendants”), by and through their attorneys of
25 record, hereby stipulate and agree pursuant to Local Rule 7-1 as follows:

1 1. Whereas, on March 9, 2020, the Court held a hearing on Defendants' Motion to
2 Dismiss (ECF No. 4). The Court granted Plaintiffs leave to amend their complaint and ordered
3 Plaintiffs to file the amended complaint by March 30, 2020. ECF No. 13.

4 2. Whereas, the Court also ordered the parties to file a joint discovery plan/scheduling
5 order by April 6, 2020. ECF No. 13.

6 3. Whereas, on March 15, 2020 Governor Sisolak announced the closure of all K-12
7 schools in the State of Nevada; the Governor has since announced a statewide order mandating all
8 non-essential businesses to remain closed for 30 days in light of the Coronavirus pandemic that is
9 affecting the nation.

10 4. Whereas, the parties are unable to meet the deadlines set by the Court on March 9,
11 2020 (ECF No. 13) due to the unexpected Coronaavirus pandemic and the effects of the same.
12 More specifically, Plaintiffs require additional time to gather information to file an amended
13 complaint and discovery cannot effectively proceed without an amended complaint on file.

14 5. Whereas, the parties agree to a 30-day extension to the deadlines set by the Court
15 on March 9, 2020 (ECF No. 13). Plaintiffs' amended complaint would be due April 29, 2020,
16 while the parties' joint discovery plan/scheduling order would be due May 6, 2020.

17 ...

18 ...

19 ...

20 ...

21 ...

22 ...

23 ...

24 ...

25 ...

26 ...

27 ...

28

1 6. Whereas, this is the first request for an extension regarding the filing of Plaintiffs'
2 amended complaint and the time to file a stipulated discovery plan/scheduling order, which is
3 made in good faith, not for the purposes of delay, and neither party is prejudiced by the brief
4 extension.

5
6 DATED: March 26, 2020

7 CLARK COUNTY SCHOOL DISTRICT
8 OFFICE OF THE GENERAL COUNSEL

9 By: /s/ Crystal J. Herrera
10 Crystal J. Herrera (#12396)
11 5100 West Sahara Avenue
Las Vegas, NV, 89146
Attorney for the *Defendants*

DATED: March 26, 2020

JUSTICE FORCE LAW GOUPLLC

By: /s/ Zarinah J. Muhammad
Zarinah J. Muhammad (#12830)
6278 Ruby Kinglet
Las Vegas, NV, 89148
Attorney for the *Plaintiff*

12
13
14 **ORDER**

15 **IT IS SO ORDERED.**

16 
17 RICHARD F. BOULWARE, II
18 UNITED STATES DISTRICT JUDGE

19 DATED this 31st day of March, 2020.
20
21
22
23
24
25
26
27
28